



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 3, 2020

BY ECF

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Muge Ma*, 20 Cr. 407 (RMB)

Dear Judge Berman:

The Government respectfully submits this letter on behalf of the parties in the above-referenced case to request an adjournment of the telephonic status conference scheduled for December 7, 2020 until the week of January 18, 2021 or thereafter.

As the Court is aware, on August 17, 2020, the defendant Muge Ma was indicted on multiple counts involving major fraud against the United States, bank fraud, wire fraud, false statements, and aggravated identity theft, in connection with a fraudulent scheme to obtain over \$20 million in Government-guaranteed loans designed to provide relief to small businesses during the novel coronavirus/COVID-19 pandemic. Since that time, the Government has produced a voluminous amount of discovery to the defendant, and the parties have been engaged in ongoing discussions regarding a potential pretrial disposition of this case. Accordingly, in order to allow time for the parties to complete our plea discussions, the parties respectfully request that the December 7, 2020 conference be adjourned for approximately six weeks until the week of January 18, 2021 or thereafter.

Finally, the Government respectfully requests that time be excluded under the Speedy Trial Act until the next conference date set by the Court pursuant to Title 18, United States Code, Section 3161(h)(7)(A). The Government submits that the exclusion of time best serves the ends of justice and outweighs the best interests of the public and the defendant in a speedy trial as it will allow time for the parties to continue our ongoing discussions regarding a potential disposition of this

December 3, 2020

Page 2

matter. The Government has consulted with defense counsel Peter Katz, Esq., who consents to the exclusion of time on behalf of the defendant.

Respectfully submitted,

AUDREY STRAUSS

Acting United States Attorney

By: 

Sagar K. Ravi

Assistant United States Attorneys

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Application granted. Conference is
adjourned to Wednesday, January 27,
2021 at 9:00 am. Time is excluded
pursuant to the Speedy Trial Act for the
reasons set forth in this letter.

SO ORDERED:

Date: 11/3/2020



Richard M. Berman, U.S.D.J.